1	THE WESTON FIRM	
2	GREGORY S. WESTON (239944) JACK FITZGERALD (257370)	
3	MELANIE PERSINGER (275423)	
3	888 Turquoise Street	
4	San Diego, CA 92109	
5	Telephone: 858 488 1672 Facsimile: 480 247 4553	
6	greg@westonfirm.com	
	jack@westonfirm.com	
7	mel@westonfirm.com	
8	LAW OFFICES OF DONALD A MADD	ON ARIC
9	LAW OFFICES OF RONALD A. MARR RONALD A. MARRON (175650)	ON, APLC
	3636 4th Avenue, Suite 202	
10	San Diego, CA 92109	
11	Telephone: 619 696 9066	
12	Facsimile: 619 564 6665 ron.marron@gmail.com	
	Ton.marton@gman.com	
13	Attorneys for Plaintiffs and the Proposed Cl	asses
14		
15		
16	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA	
	CENTRAL DISTRIC	CI OF CALIFORNIA
17	EVANGELINE RED and RACHEL	Case No. 2:10-cv-01028 GW(AGRx)
18	WHITT, on Behalf of Themselves and All	Pleading Type: Class Action
19	Others Similarly Situated,	DECLADATION OF CDECODY S
-	Plaintiffs,	DECLARATION OF GREGORY S. WESTON IN SUPPORT OF
20		PLAINTIFFS' MOTION TO COMPEL
21	v.	RESPONSES TO PLAINTIFFS'
22	VD A ET EOODS INC. VD A ET EOODS	REQUESTS FOR PRODUCTION AND INTERROGATORIES AND PRODUCE
	KRAFT FOODS INC., KRAFT FOODS NORTH AMERICA, AND KRAFT	WITNESSES PURSUANT TO RULE
23	FOODS GLOBAL, INC.,	30(B)(6).
24		
25	Defendants.	Judge: The Hon. Alicia G. Rosenberg
26		Hearing: July 12, 2011 at 10:00am Location: Courtroom D
		_ Location. Courtiooni D
27		
28		

1

4 5

6

7 8

9

10 11

12

13 14

15

16

17

18 19

20

21

22

23

24 25

26

27 28

- I am counsel for Plaintiffs in this action. I make this Declaration in support of Plaintiffs' Motion to Compel. I submit this Declaration to provide the Court with seven Exhibits cited in Plaintiffs' portions of the Joint Stipulation Regarding Plaintiffs' Motion to Compel.
- 2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs' First Requests for the Production of Documents from Kraft Foods Global, Inc., dated February 2, 2011.
- 3. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiffs' First Set of Interrogatories Addressed to Kraft Foods Global, Inc., dated February 2, 2011.
- 4. Attached hereto as **Exhibit 3** is a true and correct copy of Defendant's Responses to Plaintiffs' First Set of Requests for the Production of Documents Addressed to Kraft Foods Global, Inc., dated March 1, 2011.
- 5. Attached hereto as **Exhibit 4** is a true and correct copy of Defendant's Responses to Plaintiffs' First Set of Interrogatories Addressed to Kraft Foods Global, Inc., dated March 1, 2011.
- Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiffs' Notice of Taking Rule 30(b)(6) Deposition of Defendants, dated February 2, 2011.
- 7. Attached hereto as **Exhibit 6** is a true and correct copy of Defendant's Objections to Plaintiffs' Notice of Taking Rule 30(b)(6) Deposition of Defendants, dated March 1, 2011.
- 8. Attached hereto as **Exhibit 7** is a true and correct copy of a letter from Gregory S. Weston, counsel for Plaintiffs, to Dean Panos, counsel for Kraft, dated April 30, 2011.
- 9. Attached hereto as **Exhibit 8** is a true and correct copy of a letter from Jack Fitzgerald, counsel for Plaintiffs, to Dean Panos, dated May 11, 2011.

1	10. Attached hereto as <b>Exhibit 9</b> is a true and correct copy of a letter from		
2	Dean Panos to Jack Fitzgerald, dated May 18, 2011.		
3	11. Attached hereto as Exhibit 10 is a true and correct copy of a four-		
4	page excerpt (KFG 000293-296) from the documents Kraft produced in response		
5	to Plaintiffs' First Requests for the Production of Documents.		
6	12. Attached hereto as <b>Exhibit 11</b> is a true and correct copy of excerpts of		
7	the Deposition Transcript of Amelia Strobel, dated April 13, 2011.		
8	13. Attached hereto as <b>Exhibit 12</b> is a true and correct copy of excerpts of		
9	the Deposition Transcript of Jim Low, dated April 26, 2011.		
10			
11	I declare under penalty of perjury under the laws of the United States of		
12	America that the foregoing is true and correct.		
13			
14	Executed on June 15, 2011, in San Diego, California.		
15			
16	/s/ Gregory S. Weston		
17	Gregory S. Weston		
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

1	DATED: June 15, 2011	Respectfully Submitted,
2		
3		/s/Gregory S. Weston
4		Gregory S. Weston
5		THE WESTON FIRM
6		GREGORY S. WESTON
7		JACK FITZGERALD MELANIE PERSINGER
8		888 Turquoise Street
9		San Diego, CA 92109 Telephone: 858 488 1672
10		Facsimile: 480 247 4553
11		LAW OFFICES OF RONALD A.
12		MARRON, APLC
13		RONALD A. MARRON 3636 4th Street, Suite 202
14		San Diego, CA 92103
15		Telephone: 619 696 9066 Facsimile: 619 564 6665
16		
17		Counsel for Plaintiffs and the Proposed Class
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
	3	